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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE META PIXEL TAX FILING CASES

This Document Relates To:

All Actions

Case No. 5:22-cv-07557-PCP (VKD)

**DECLARATION OF JESSICA
STEBBINS BINA IN SUPPORT OF
DEFENDANT META PLATFORMS,
INC.'S MOTION TO EXCLUDE THE
EXPERT REPORT AND TESTIMONY
OF ROBERT ZEIDMAN**

Date: January 15, 2026

Time: 10:00 a.m.

Court: Courtroom 8, 4th Floor

Honorable P. Casey Pitts

1 I, Jessica Stebbins Bina, declare as follows:

2 1. I am an attorney licensed to practice in the State of California, and a member of the
3 Bar of this Court. I am a partner at the law firm Latham & Watkins LLP, counsel of record for
4 Defendant Meta Platforms, Inc. (“Meta”) in this case. I have personal knowledge of the facts stated
5 below and, if called as a witness, I could and would testify competently thereto. I submit this
6 declaration in support of Defendant Meta Platforms, Inc.’s Motion to Exclude the Expert Report
7 and Testimony of Robert Zeidman.

8 2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the October
9 3, 2025 deposition of Robert Zeidman.

10 3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the June
11 24, 2025 deposition of the plaintiff referred to in this action as Jane Doe.

12 4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts of the document
13 produced by Meta in discovery in this action as Bates number PIXEL_TAX000003585, which
14 reflect sample data produced by Meta related to the Meta Pixel.

15 5. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts of the document
16 produced by Meta in discovery in this action as Bates number PIXEL_TAX000023351, which
17 reflect sample data produced by Meta related to the Meta Pixel.

18
19 I declare under penalty of perjury that the foregoing is true and correct.

20 Executed on October 27, 2025, at Culver City, California.

21
22 By: /s/ Jessica Stebbins Bina
23 Jessica Stebbins Bina

24 *Attorneys for Defendant Meta Platforms, Inc.*
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